

1 **2. NTC USA's Specific Contentions and Points of Authority**

2 In addition to its General Contentions and Points of Authority, NTC USA makes
3 the following specific objections to Request for Admission No. 24:

- 4 • NTC USA objects to this request because it seeks information that is equally available to
5 FMA. *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478,
6 *6-7 (N.D. Cal. 2007). Specifically, FMA may obtain this information from its own
7 business records.

8 **REQUEST FOR ADMISSION NO. 25:**

9 Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*,
10 No. 06-CV-00025 in the District of Guam, Nanya had no correspondence with FMA in Guam.

11 **1. FMA's Position**

12 *See supra* section II (FMA'S General Contentions and Points of Authority).

13 **2. NTC USA's Specific Contentions and Points of Authority**

14 In addition to its General Contentions and Points of Authority, NTC USA makes
15 the following specific objections to Request for Admission No. 25:

- 16 • NTC USA objects to this request because it seeks information that is equally available to
17 FMA. *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478,
18 *6-7 (N.D. Cal. 2007). Specifically, FMA may obtain this information from its own
19 business records.

20 **REQUEST FOR ADMISSION NO. 26:**

21 Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*,
22 No. 06-CV-00025 in the District of Guam, Nanya had no correspondence with Fujitsu relating to
23 any business in Guam.

24 **1. FMA's Position**

25 *See supra* section II (FMA'S General Contentions and Points of Authority).

26 **2. NTC USA's Specific Contentions and Points of Authority**

 In addition to its General Contentions and Points of Authority, NTC USA makes
the following specific objections to Request for Admission No. 26:

- NTC USA objects to this request because it seeks information that is equally available to
FMA. *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478,
*6-7 (N.D. Cal. 2007). Specifically, FMA may obtain this information from its own
business records.

REQUEST FOR ADMISSION NO. 27:

Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*, No. 06-CV-00025 in the District of Guam, Nanya had no correspondence with FMA relating to any business in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC USA's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC USA makes the following specific objections to Request for Admission No. 27:

- NTC USA objects to this request because it seeks information that is equally available to FMA. *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478, *6-7 (N.D. Cal. 2007). Specifically, FMA may obtain this information from its own business records.

REQUEST FOR ADMISSION NO. 28:

Admit that Nanya does not file a tax return in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC USA's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC USA makes the following specific objections to Request for Admission No. 28:

- NTC USA objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 29:

Admit that Nanya does not distribute any products concerning the subject matter of this action in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

1 **2. NTC USA's Specific Contentions and Points of Authority**

2 In addition to its General Contentions and Points of Authority, NTC USA makes
3 the following specific objections to Request for Admission No. 29:

- 4 • NTC USA objects to this request because it seeks information not relevant to the
5 jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P.
6 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will
7 have no bearing on the propriety of the Court's exercise of personal jurisdiction over
8 Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M,
9 Stipulation, Dkt. No. 148, at 2).
- 10 • NTC USA objects to this request as being vague and ambiguous. Specifically, the request
11 fails to apprise NTC USA of the meaning of the phrase "products concerning the subject
12 matter of this action in Guam." *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS),
13 2007 U.S. Dist. LEXIS 8478, *6-7 (N.D. Cal. 2007).

14 **REQUEST FOR ADMISSION NO. 30:**

15 Admit that Nanya Accused Products are offered for sale in the Northern District of
16 California.

17 **1. FMA's Position**

18 *See supra* section II (FMA'S General Contentions and Points of Authority).

19 **2. NTC USA's Specific Contentions and Points of Authority**

20 In addition to its General Contentions and Points of Authority, NTC USA makes
21 the following specific objections to Request for Admission No. 30:

- 22 • NTC USA objects to this request because it seeks information not relevant to the
23 jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P.
24 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will
25 have no bearing on the propriety of the Court's exercise of personal jurisdiction over
26 Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M,
Stipulation, Dkt. No. 148, at 2).

27 **REQUEST FOR ADMISSION NO. 31:**

28 Admit that Nanya Accused Products are sold in the Northern District of California.

29 **1. FMA's Position**

30 *See supra* section II (FMA'S General Contentions and Points of Authority).

1 **2. NTC USA's Specific Contentions and Points of Authority**

2 In addition to its General Contentions and Points of Authority, NTC USA makes
3 the following specific objections to Request for Admission No. 31:

- 4 • NTC USA objects to this request because it seeks information not relevant to the
5 jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P.
6 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will
7 have no bearing on the propriety of the Court's exercise of personal jurisdiction over
8 Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M,
9 Stipulation, Dkt. No. 148, at 2).

10 **REQUEST FOR ADMISSION NO. 32:**

11 Admit that Nanya Accused Products are imported into the Northern District of California.

12 **1. FMA's Position**

13 *See supra* section II (FMA'S General Contentions and Points of Authority).

14 **2. NTC USA's Specific Contentions and Points of Authority**

15 In addition to its General Contentions and Points of Authority, NTC USA makes
16 the following specific objections to Request for Admission No. 32:

- 17 • NTC USA objects to this request because it seeks information not relevant to the
18 jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P.
19 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will
20 have no bearing on the propriety of the Court's exercise of personal jurisdiction over
21 Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M,
22 Stipulation, Dkt. No. 148, at 2).

23 **REQUEST FOR ADMISSION NO. 33:**

24 Admit that Nanya obtains revenue from Nanya Accused Products sold within the Northern
25 District of California.

26 **1. FMA's Position**

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC USA's Specific Contentions and Points of Authority

 In addition to its General Contentions and Points of Authority, NTC USA makes
the following specific objections to Request for Admission No. 33:

- NTC USA objects to this request because it seeks information not relevant to the
jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P.

26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 34:

Admit that the United States District Court for the Northern District of California has personal jurisdiction over Nanya.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC USA's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC USA makes the following specific objections to Request for Admission No. 34:

- NTC USA objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

D. FMA'S REQUESTS FOR ADMISSIONS TO NTC

REQUEST FOR ADMISSION NO. 1:

Admit that Nanya does not maintain any offices in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 1:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 2:

Admit that Nanya does not maintain any operations in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 2:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 3:

Admit that Nanya does not have any employees in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 3:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 4:

Admit that Nanya does not have any affiliates in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

1 **2. NTC's Specific Contentions and Points of Authority**

2 In addition to its General Contentions and Points of Authority, NTC makes the
3 following specific objections to Request for Admission No. 4:

- 4 • NTC objects to this request because it seeks information not relevant to the jurisdictional
5 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
6 Specifically, the request seeks discovery of information related to Nanya that will have no
7 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
8 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
9 No. 148, at 2).

10 **REQUEST FOR ADMISSION NO. 5:**

11 Admit that Nanya does not have any salespersons in Guam.

12 **1. FMA's Position**

13 *See supra* section II (FMA'S General Contentions and Points of Authority).

14 **2. NTC's Specific Contentions and Points of Authority**

15 In addition to its General Contentions and Points of Authority, NTC makes the
16 following specific objections to Request for Admission No. 5:

- 17 • NTC objects to this request because it seeks information not relevant to the jurisdictional
18 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
19 Specifically, the request seeks discovery of information related to Nanya that will have no
20 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
21 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
22 No. 148, at 2).

23 **REQUEST FOR ADMISSION NO. 6:**

24 Admit that Nanya has not advertised any products in the Guam local newspapers or Guam
25 local magazines in the six years before the Complaint was filed in this action.

26 **1. FMA's Position**

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

 In addition to its General Contentions and Points of Authority, NTC makes the
following specific objections to Request for Admission No. 6:

- NTC objects to this request because it seeks information not relevant to the jurisdictional
issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).

Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 7:

Admit that Nanya has not advertised any services in the Guam local newspapers or Guam local magazines in the six years before the Complaint was filed in this action.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 7:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 8:

Admit that Nanya does not have real property in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 8:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 9:

Admit that Nanya does not lease any facility in Guam.

1 **1. FMA's Position**

2 *See supra* section II (FMA'S General Contentions and Points of Authority).

3 **2. NTC's Specific Contentions and Points of Authority**

4 In addition to its General Contentions and Points of Authority, NTC makes the
5
6 following specific objections to Request for Admission No. 9:

- 7 • NTC objects to this request because it seeks information not relevant to the jurisdictional
8 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
9 Specifically, the request seeks discovery of information related to Nanya that will have no
10 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
No. 148, at 2).

11 **REQUEST FOR ADMISSION NO. 10:**

12 Admit that Nanya does not have a bank account in Guam.

13 **1. FMA's Position**

14 *See supra* section II (FMA'S General Contentions and Points of Authority).

15 **2. NTC's Specific Contentions and Points of Authority**

16 In addition to its General Contentions and Points of Authority, NTC makes the
17 following specific objections to Request for Admission No. 10:

- 18 • NTC objects to this request because it seeks information not relevant to the jurisdictional
19 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
20 Specifically, the request seeks discovery of information related to Nanya that will have no
21 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
No. 148, at 2).

22 **REQUEST FOR ADMISSION NO. 11:**

23 Admit that Nanya does not maintain a telephone number in Guam.

24 **1. FMA's Position**

25 *See supra* section II (FMA'S General Contentions and Points of Authority).

1 **2. NTC's Specific Contentions and Points of Authority**

2 In addition to its General Contentions and Points of Authority, NTC makes the
3 following specific objections to Request for Admission No. 11:

- 4 • NTC objects to this request because it seeks information not relevant to the jurisdictional
5 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
6 Specifically, the request seeks discovery of information related to Nanya that will have no
7 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
8 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
9 No. 148, at 2).

10 **REQUEST FOR ADMISSION NO. 12:**

11 Admit that Nanya does not maintain a telefax number in Guam.

12 **1. FMA's Position**

13 *See supra* section II (FMA'S General Contentions and Points of Authority).

14 **2. NTC's Specific Contentions and Points of Authority**

15 In addition to its General Contentions and Points of Authority, NTC makes the
16 following specific objections to Request for Admission No. 12:

- 17 • NTC objects to this request because it seeks information not relevant to the jurisdictional
18 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
19 Specifically, the request seeks discovery of information related to Nanya that will have no
20 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
21 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
22 No. 148, at 2).

23 **REQUEST FOR ADMISSION NO. 13:**

24 Admit that Nanya does not have a telex number in Guam.

25 **1. FMA's Position**

26 *See supra* section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

 In addition to its General Contentions and Points of Authority, NTC makes the
following specific objections to Request for Admission No. 13:

- NTC objects to this request because it seeks information not relevant to the jurisdictional
 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
 Specifically, the request seeks discovery of information related to Nanya that will have no

bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 14:

Admit that Nanya does not have any directors in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 14:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 15:

Admit that Nanya does not have any officers in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 15:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 16:

Admit that Nanya does not maintain a post office box in Guam.

1 **1. FMA's Position**

2 *See supra* section II (FMA'S General Contentions and Points of Authority).

3 **2. NTC's Specific Contentions and Points of Authority**

4 In addition to its General Contentions and Points of Authority, NTC makes the
5 following specific objections to Request for Admission No. 16:

- 6 • NTC objects to this request because it seeks information not relevant to the jurisdictional
7 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
8 Specifically, the request seeks discovery of information related to Nanya that will have no
9 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
10 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
11 No. 148, at 2).

12 **REQUEST FOR ADMISSION NO. 17:**

13 Admit that Nanya does not maintain a street address in Guam.

14 **1. FMA's Position**

15 *See supra* section II (FMA'S General Contentions and Points of Authority).

16 **2. NTC's Specific Contentions and Points of Authority**

17 In addition to its General Contentions and Points of Authority, NTC makes the
18 following specific objections to Request for Admission No. 17:

- 19 • NTC objects to this request because it seeks information not relevant to the jurisdictional
20 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
21 Specifically, the request seeks discovery of information related to Nanya that will have no
22 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
23 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
24 No. 148, at 2).

25 **REQUEST FOR ADMISSION NO. 18:**

26 Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*,
No. 06-CV-00025 in the District of Guam, Nanya has never been party to a lawsuit or legal
proceeding in any Guam Federal District Court.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 18:

- NTC objects to this request because it seeks information that is equally available to FMA. *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478, *6-7 (N.D. Cal. 2007). Specifically, FMA may obtain this information from a search on PACER.
- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 19:

Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*, No. 06-CV-00025 in the District of Guam, Nanya did not have in Guam any documents relevant to the subject matter of this lawsuit.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 19:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 20:

Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*, No. 06-CV-00025 in the District of Guam, Nanya had not appointed an agent in Guam for service of process.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 20:

- NTC objects to this request because it seeks information that is equally available to FMA. *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478, *6-7 (N.D. Cal. 2007). Specifically, FMA's local counsel may obtain this information from Guam's public records.
- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 21:

Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*, No. 06-CV-00025 in the District of Guam, Nanya had not negotiated any agreements in Guam concerning the subject matter of this action.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

I In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 21:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 22:

Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*, No. 06-CV-00025 in the District of Guam, Nanya had not executed any agreements in Guam concerning the subject matter of this action.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

I In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 22:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 23:

Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*, No. 06-CV-00025 in the District of Guam, Nanya had not executed any agreements that called for Nanya's performance in Guam concerning the subject matter of this action.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 23:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).
- NTC objects to this request as being vague and ambiguous. Specifically, the request fails to apprise NTC of the meaning of the phrase "agreements that called for Nanya's performance in Guam concerning the subject matter of this action." *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478, *6-7 (N.D. Cal. 2007).

REQUEST FOR ADMISSION NO. 24:

Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*, No. 06-CV-00025 in the District of Guam, Nanya had no correspondence with Fujitsu in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

1 **2. NTC's Specific Contentions and Points of Authority**

2 In addition to its General Contentions and Points of Authority, NTC makes the
3 following specific objections to Request for Admission No. 24:

- 4 • NTC objects to this request because it seeks information that is equally available to FMA.
5 *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478, *6-7
6 (N.D. Cal. 2007). Specifically, FMA may obtain this information from its own business
7 records.

8 **REQUEST FOR ADMISSION NO. 25:**

9 Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*,
10 No. 06-CV-00025 in the District of Guam, Nanya had no correspondence with FMA in Guam.

11 **1. FMA's Position**

12 *See supra* section II (FMA'S General Contentions and Points of Authority).

13 **2. NTC's Specific Contentions and Points of Authority**

14 In addition to its General Contentions and Points of Authority, NTC makes the
15 following specific objections to Request for Admission No. 25:

- 16 • NTC objects to this request because it seeks information that is equally available to FMA.
17 *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478, *6-7
18 (N.D. Cal. 2007). Specifically, FMA may obtain this information from its own business
19 records.

20 **REQUEST FOR ADMISSION NO. 26:**

21 Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*,
22 No. 06-CV-00025 in the District of Guam, Nanya had no correspondence with Fujitsu relating to
23 any business in Guam.

24 **1. FMA's Position**

25 *See supra* section II (FMA'S General Contentions and Points of Authority).

26 **2. NTC's Specific Contentions and Points of Authority**

 In addition to its General Contentions and Points of Authority, NTC makes the
following specific objections to Request for Admission No. 26:

- NTC objects to this request because it seeks information that is equally available to FMA.
McColm v. Housing Auth., No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478, *6-7
(N.D. Cal. 2007). Specifically, FMA may obtain this information from its own business
records.

REQUEST FOR ADMISSION NO. 27:

Admit that prior to engaging Guam counsel to file *Nanya Tech. Corp. v. Fujitsu Limited*, No. 06-CV-00025 in the District of Guam, Nanya had no correspondence with FMA relating to any business in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 27:

- NTC objects to this request because it seeks information that is equally available to FMA. *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S. Dist. LEXIS 8478, *6-7 (N.D. Cal. 2007). Specifically, FMA may obtain this information from its own business records.

REQUEST FOR ADMISSION NO. 28:

Admit that Nanya does not file a tax return in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 28:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 29:

Admit that Nanya does not distribute any products concerning the subject matter of this action in Guam.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

1 **2. NTC's Specific Contentions and Points of Authority**

2 In addition to its General Contentions and Points of Authority, NTC makes the
3 following specific objections to Request for Admission No. 29:

- 4 • NTC objects to this request because it seeks information not relevant to the jurisdictional
5 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
6 Specifically, the request seeks discovery of information related to Nanya that will have no
7 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
8 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
9 No. 148, at 2).
- 10 • NTC objects to this request as being vague and ambiguous. Specifically, the request fails
11 to apprise NTC of the meaning of the phrase "products concerning the subject matter of
12 this action in Guam." *McColm v. Housing Auth.*, No. C-02-5810 PJH (JCS), 2007 U.S.
13 Dist. LEXIS 8478, *6-7 (N.D. Cal. 2007).

14 **REQUEST FOR ADMISSION NO. 30:**

15 Admit that Nanya Accused Products are offered for sale in the Northern District of
16 California.

17 **1. FMA's Position**

18 *See supra* section II (FMA'S General Contentions and Points of Authority).

19 **2. NTC's Specific Contentions and Points of Authority**

20 In addition to its General Contentions and Points of Authority, NTC makes the
21 following specific objections to Request for Admission No. 30:

- 22 • NTC objects to this request because it seeks information not relevant to the jurisdictional
23 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
24 Specifically, the request seeks discovery of information related to Nanya that will have no
25 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
26 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
No. 148, at 2).

27 **REQUEST FOR ADMISSION NO. 31:**

28 Admit that Nanya Accused Products are sold in the Northern District of California.

29 **1. FMA's Position**

30 *See supra* section II (FMA'S General Contentions and Points of Authority).

1 **2. NTC's Specific Contentions and Points of Authority**

2 In addition to its General Contentions and Points of Authority, NTC makes the
3 following specific objections to Request for Admission No. 31:

- 4 • NTC objects to this request because it seeks information not relevant to the jurisdictional
5 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
6 Specifically, the request seeks discovery of information related to Nanya that will have no
7 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
8 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
9 No. 148, at 2).

10 **REQUEST FOR ADMISSION NO. 32:**

11 Admit that Nanya Accused Products are imported into the Northern District of California.

12 **1. FMA's Position**

13 *See supra* section II (FMA'S General Contentions and Points of Authority).

14 **2. NTC's Specific Contentions and Points of Authority**

15 In addition to its General Contentions and Points of Authority, NTC makes the
16 following specific objections to Request for Admission No. 32:

- 17 • NTC objects to this request because it seeks information not relevant to the jurisdictional
18 issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).
19 Specifically, the request seeks discovery of information related to Nanya that will have no
20 bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants,
21 which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt.
22 No. 148, at 2).

23 **REQUEST FOR ADMISSION NO. 33:**

24 Admit that Nanya obtains revenue from Nanya Accused Products sold within the Northern
25 District of California.

26 **1. FMA's Position**

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

 In addition to its General Contentions and Points of Authority, NTC makes the
following specific objections to Request for Admission No. 33:

- NTC objects to this request because it seeks information not relevant to the jurisdictional
issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1).

Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

REQUEST FOR ADMISSION NO. 34:

Admit that the United States District Court for the Northern District of California has personal jurisdiction over Nanya.

1. FMA's Position

See supra section II (FMA'S General Contentions and Points of Authority).

2. NTC's Specific Contentions and Points of Authority

In addition to its General Contentions and Points of Authority, NTC makes the following specific objections to Request for Admission No. 34:

- NTC objects to this request because it seeks information not relevant to the jurisdictional issues before the Court or the claim or defense of any party. FED. R. CIV. P. 26(b)(1). Specifically, the request seeks discovery of information related to Nanya that will have no bearing on the propriety of the Court's exercise of personal jurisdiction over Defendants, which is the only issue to be addressed in discovery at this time. (Ex. M, Stipulation, Dkt. No. 148, at 2).

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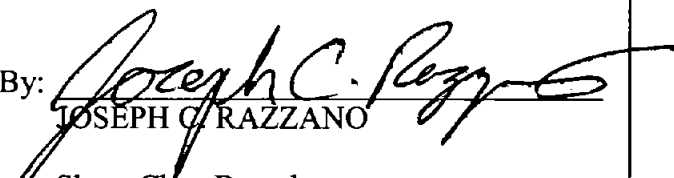
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1 **Approved as to Form and Content:**

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